

Cedric Johnson

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CEDRIC LYN JOHNSON (B18840),)
)
 Plaintiff,)
)
 vs.) No. 15CV885
)
 EVARISTO AGUINALDO,)
)
 Defendant.)

DISCOVERY DEPOSITION OF CEDRIC JOHNSON

The deposition of CEDRIC JOHNSON taken before MICHELE A. BORELLO, Certified Shorthand Reporter, Registered Professional Reporter, and Notary Public, pursuant to the provisions of the Rules of Civil Procedure of the State of Illinois and the Rules of the Supreme Court thereof pertaining to the taking of depositions for the purpose of discovery at 15 West Jefferson Street, Joliet, Illinois, commencing at the hour of 12:50 o'clock on the 12th of June, A.D. 2017.

Cedric Johnson

A P P E A R A N C E S:

BRYAN CAVE, LLP
 BY: MR. STEVEN TRUBAC
 161 North Clark Street, Suite 4300
 Chicago, Illinois 60601

On behalf of the Plaintiff;

CUNNINGHAM, MEYER & VEDRINE, P.C.
 BY: MR. CHAD M. SKARPIAK
 One East Wacker Drive, Suite 2200
 Chicago, Illinois 60601

On behalf of the Defendant.

I N D E X

WITNESS

EXAMINATION

CEDRIC JOHNSON

Direct Examination by Mr. Skarpiak	3
Cross Examination by Mr. Trubac	56
Redirect Examination by Mr. Skarpiak	60

E X H I B I T S

NUMBER

MARKED FOR ID

Exhibit A	39
Exhibit B	41
Exhibit C	42
Exhibit D	52

Cedric Johnson

1 (Witness sworn.)

2 WHEREUPON:

3 CEDRIC JOHNSON,
4 having been first duly sworn was examined and
5 testified as follows:

6 DIRECT EXAMINATION

7 BY MR. SKARPIAK

8 Q. Could you please state your name for
9 the record?

10 A. Cedric Lyn Johnson.

11 Q. We're here today for the deposition of
12 the plaintiff Cedric Johnson in the case captioned
13 15 C 885, Johnson versus Aguinaldo, which is
14 currently pending in the United States District
15 Court for the Northern District of Illinois,
16 Eastern Division, and pursuant to notice and
17 agreement to the parties. All applicable Federal
18 and Local Rules will apply.

19 Good afternoon, Mr. Johnson. My
20 name is Chad Skarpiak. I represent the defendant,
21 Dr. Aguinaldo. Have you ever been deposed before?

22 A. No.

23 Q. I will just give you a few ground rules
24 so we make sure we are on the same page as to how

Cedric Johnson

1 the deposition is going to proceed. The most
2 important person in the room right now is the
3 court reporter. She is typing down everything
4 that we are saying. And it's important that we
5 get a clean record as to my questions and your
6 answers to them and your counsel if he has any
7 questions, too. So we make sure that when we are
8 done with it we have a clean record of what was
9 actually said here today. Is that fair?

10 A. Yes.

11 Q. And you're doing a great job so far. In
12 response to my questions I would ask that you give
13 a verbal answer such as a yes or no. Sometimes
14 folks say uh-huh or huh-uh and while it may be
15 clear in the room as to what you're saying when we
16 look at the transcript later it's a little muddled
17 as to if you were saying something affirmatively,
18 it's a yes, or in the negative or a no. So just
19 make sure to emphasize either yes or no instead of
20 some other verbal cue. Does that make sense?

21 A. Yes.

22 Q. And, again, to try to get a clean record
23 here, please wait until I'm finished asking my
24 question before responding to it. Sometimes you

Cedric Johnson

1 can anticipate where I'm going with a question and
2 you may want to jump in but just wait until I'm
3 completely finished with my question before
4 answering it so we have a clear question, answer,
5 question, answer. Is that fair?

6 A. Yes.

7 Q. And, likewise, I will do my best to make
8 sure that you've answered completely before moving
9 on to the next question. If by chance I interrupt
10 you mid answer, please let me know and I will let
11 you carry out the answer. Is that fair?

12 A. Yes.

13 Q. The other important point to note is if
14 you have any trouble with comprehending my
15 question such as you're confused by the question,
16 I'm not specific enough for you, please let me
17 know because otherwise if you answer we will all
18 assume you understood the question and have
19 answered appropriately. Is that fair?

20 A. Yes.

21 Q. If you need to take a break at any time,
22 let us know. We're happy to do that. My only
23 caveat is if I have asked you a question I would
24 ask you to please answer it before we take the

Cedric Johnson

1 break. Is that fair?

2 A. Yes.

3 Q. You have taken an oath this afternoon.
4 Do you understand that oath?

5 A. Yes.

6 Q. Any reason that you won't be able to be
7 testifying truthfully today?

8 A. No.

9 Q. Have you consumed any medication or
10 drugs or alcohol within the last 24 hours?

11 A. No.

12 Q. Prior to sitting in today's deposition
13 did you review any documentation in preparation
14 for your deposition?

15 A. Yes.

16 Q. Can you tell me what you reviewed?

17 A. I reviewed the documents from what my
18 attorney gave me.

19 Q. Do you recall what kind of documents
20 those were?

21 A. Documents about my complaint.

22 Q. Did you review any medical records
23 before coming here today?

24 A. Yes.

Cedric Johnson

1 Q. And do you recall which kind of medical
2 records you reviewed prior to today's deposition?

3 A. The medical records from Stateville NRC.

4 Q. Did you review any other categories of
5 documents?

6 A. Nothing but just the Complaint what I
7 made.

8 Q. Was that the handwritten Complaint that
9 you initially wrote or was it the Amended
10 Complaint?

11 A. My grievance complaint and some more
12 medical documents.

13 Q. Fair enough. Did you speak with anyone
14 except your attorney in preparation for this
15 deposition today?

16 A. No.

17 Q. And how old are you currently, sir?

18 A. 45.

19 Q. Do you go by any other names or aliases?

20 A. No.

21 Q. Do you recall your IDOC inmate number?

22 A. B18840.

23 Q. Where do you currently reside?

24 A. 7801 Boxwood Lane, Plainfield, Illinois.

Cedric Johnson

1 Q. Do you live alone?

2 A. No.

3 Q. Who do you live with?

4 A. My mother.

5 Q. Anyone else?

6 A. And I got two brothers.

7 Q. They live at Boxwood Lane?

8 A. Yes.

9 Q. And what's your mother's name?

10 A. Joberta Johnson.

11 Q. Can you spell that for us?

12 A. J-o-b-e-r-t-a.

13 Q. How about your brothers' names?

14 A. Robert Johnson and Leo Johnson.

15 Q. That's L-e-o?

16 A. L-e-o, yes.

17 Q. Are you currently married?

18 A. No.

19 Q. Have you been married in the past?

20 A. No.

21 Q. Do you have any children?

22 A. Two.

23 Q. How old are your children?

24 A. One is 19 and one is 20.

Cedric Johnson

1 Q. Boy or girl?

2 A. Boy and a girl.

3 Q. Where do they currently live?

4 A. In Bolingbrook, Illinois.

5 Q. Do they live with their mother?

6 A. Yes.

7 Q. Mr. Johnson, how long have you lived at
8 7801 Boxwood?

9 A. I would say 15 years.

10 Q. Have you lived there since your current
11 release from incarceration, from your last period
12 of incarceration?

13 MR. TRUBAC: If you can rephrase the
14 question.

15 MR. SKARPIAK: Sure.

16 BY MR. SKARPIAK:

17 Q. Mr. Johnson, my understanding is you
18 were released from prison approximately in 2016.
19 Do I have that correct?

20 A. Yes.

21 Q. Since your release have you lived at
22 7801 Boxwood?

23 A. Yes and no. I was on house arrest in
24 Chicago. So I stayed out there for two months at

Cedric Johnson

1 my aunt's house.

2 Q. And then after that you went to Boxwood?

3 A. Yes.

4 Q. What's the highest level of education
5 you received?

6 A. I have a G.E.D.

7 Q. Did you receive that G.E.D. while in
8 prison?

9 A. Yes.

10 Q. Do you have any medical training at all?

11 A. Can you rephrase that.

12 Q. Do you have any medical training at all?

13 A. No.

14 Q. Did you ever serve in the military?

15 A. No.

16 Q. My understanding is that you have had
17 several periods of incarceration throughout your
18 life. Can you tell me generally what -- if you
19 walk me through your employment history.

20 A. I was working for Labor Ready and Little
21 Caesars Pizza.

22 Q. Just to shortcut this.

23 I apologize. I thought we had a
24 list of where you were employed before but I can't

Cedric Johnson

1 find it right now.

2 So you're saying Labor Ready,
3 Little Caesars Pizza?

4 A. Yes. I worked at a couple more places
5 but I can't recall.

6 Q. Can't recall the specific dates when you
7 were employed there?

8 A. Yes.

9 Q. Since your release from prison in 2016
10 have you been employed at all?

11 A. No.

12 Q. Do you receive social security payments
13 at all?

14 A. I'm receiving LINK.

15 Q. I'm sorry. Could you repeat that?

16 A. I receive LINK.

17 Q. Do you receive disability payments at
18 all?

19 A. No. I'm going through the process of
20 getting disability.

21 Q. How far along are you in that process?

22 A. Maybe two years or a year.

23 Q. Do you know where your application
24 currently is?

Cedric Johnson

1 A. I think it's with my attorneys for the
2 disability.

3 Q. Who is your counsel on that?

4 A. I think it's Meyers. Miler.

5 Q. Is that the firm name?

6 A. Yes. I got like -- they say I got like
7 13 of them working on my disability. 13 people.

8 Q. With your most recent period of
9 incarceration could you tell me what crime you
10 were convicted of in that incarceration?

11 A. It was a retail theft.

12 Q. Was it a plea or a trial?

13 A. No. I pleaded.

14 Q. Mr. Johnson, I'm going to hand you what
15 my understanding is your answer to our
16 interrogatories. Have you seen that document
17 before?

18 A. Yes. I briefly went over it.

19 Q. If I could flip you to like the third
20 page. There's a chart which lists out several
21 offenses and sentences. Could you review that and
22 let me know if that is a correct resuscitation of
23 your previous criminal history.

24 MR. TRUBAC: Chad, is that the amended or the

Cedric Johnson

1 supplemental interrogatory responses?

2 MR. SKARPIAK: Yes. It's First Supplemental
3 Objections and Responses.

4 THE WITNESS: I can't recall all of them but,
5 yes, it looks kind of right.

6 BY MR. SKARPIAK:

7 Q. To the best of your knowledge that
8 appears to be a complete history of your criminal
9 history?

10 A. Yes, to the best of my knowledge.

11 MR. TRUBAC: Are you going to mark that as an
12 exhibit?

13 MR. SKARPIAK: No.

14 Q. MR. TRUBAC: Okay.

15 BY MR. SKARPIAK:

16 Q. Mr. Johnson, my understanding is your
17 Complaint against my client, Dr. Aguinaldo, is
18 that subsequent to an altercation with another
19 inmate you received treatment from him but you
20 claim that the treatment was insufficient and he
21 didn't do as much as you would like him to. Do I
22 have that correct?

23 A. Yes.

24 Q. If I could just kind of walk you through

Cedric Johnson

1 a little bit of your medical history. My
2 understanding based upon the records is that in
3 approximately April of 1994 you went to Loyola
4 Hospital as a result of a gunshot wound to your
5 head. Do I have that correct?

6 A. Yes.

7 Q. Can you tell me where the gunshot wound
8 occurred?

9 A. Bolingbrook.

10 Q. Approximately where on your head were
11 you shot?

12 A. Right in the back (indicating).

13 Q. And I believe you're touching the right
14 side?

15 A. Yes, on right side.

16 Q. Looks like a little bit behind your ear.
17 Do I have that correct?

18 A. Yes.

19 Q. Did you have surgery to repair the
20 injury?

21 A. No. The bullet is still -- fragments of
22 the bullet is still in my head.

23 Q. Immediately after you were shot and you
24 visited the hospital did you notice any lingering

Cedric Johnson

1 effects?

2 A. Yes. I hear like loud ringing in my ear
3 sometimes. Apparently sometimes I had headaches.

4 Q. When did the headaches begin to the best
5 of your recollection?

6 A. Like right after I was shot.

7 Q. When you say right after you were shot
8 was it a day or two after you left the hospital,
9 was it a week or two?

10 A. I would say probably a day or two.

11 Q. Can you describe to me what those
12 headaches felt like?

13 A. Felt like migraines sometimes.

14 Q. Where would the pain be located at?

15 A. Like in the back in my head. Back of my
16 head.

17 Q. How would you describe the pain you were
18 feeling?

19 MR. TRUBAC: Objection. Asked and answered.

20 MR. SKARPIAK: Sure.

21 BY MR. SKARPIAK:

22 Q. Can you describe for me the severity of
23 the pain you were feeling?

24 A. Just painful.

Cedric Johnson

1 Q. Well, say on a scale of one to ten, one
2 being very minimal pain to ten being the most
3 excruciating pain that you've ever experienced,
4 where would you put the pain that you were feeling
5 from the headaches after you were shot in 1994?

6 A. I would put it at like an eight.

7 Q. Would the pain be constant or would it
8 come and go?

9 A. It would come and go.

10 Q. How frequently would it come and go?

11 A. It would happen often.

12 Q. Several times a week?

13 A. Probably would say like three to four
14 times a week.

15 Q. And my understanding is in 2004 you were
16 struck with a bat to the back of the head and were
17 placed in a coma; is that correct?

18 A. Yes.

19 Q. Do you know when in 2004 that incident
20 occurred?

21 A. No.

22 Q. Do you have any sense of when during the
23 year when it occurred such as spring, summer,
24 fall, winter?

Cedric Johnson

1 A. It was summertime.

2 Q. Do you recall which hospital you went to
3 as a result of that injury?

4 A. No. I can't recall.

5 Q. If we can look from the period of a day
6 or two after you were shot in 1994 to 2004 did the
7 pain -- your headaches -- did that change at all
8 or was that constant throughout that period of
9 time?

10 A. No. It got better.

11 Q. Tell me how it got better.

12 A. It stopped occurring so frequently.

13 Q. When did you notice the frequency
14 beginning to decrease?

15 A. I would say after the incident in
16 Stateville with the fight.

17 Q. And you noticed it was getting better
18 after the fight?

19 A. No. It had got worse.

20 Q. And my question is between 1994 and 2004
21 you said it was getting better. Can you tell me
22 that period of time when you felt the headaches
23 were getting better?

24 A. Just started getting better.

Cedric Johnson

1 Q. In 2004 before you were struck with the
2 bat how frequently would you have the headaches?

3 A. I can't recall that.

4 Q. Can you recall the severity of the
5 headaches you were receiving in 2004?

6 A. Yes. My doctor prescribed me with
7 some -- I can't recall in 2004 the severity.

8 MR. TRUBAC: Do you need to take a break?

9 THE WITNESS: Yes.

10 MR. TRUBAC: Can we take a break?

11 MR. SKARPIAK: Absolutely.

12 (WHEREUPON, a recess was had.)

13 BY MR. SKARPIAK:

14 Q. We were talking about the injury that
15 you received to the back of your head with the
16 bat. What, if anything, do you recall from that
17 incident at all?

18 A. Just me just getting jumped.

19 Q. Do you recall how long you were in a
20 coma for?

21 A. No.

22 Q. Once you woke up from your coma can you
23 tell me if you had any change in the headaches you
24 were experiencing?

Cedric Johnson

1 A. Yes.

2 Q. What kind of changes were you
3 experiencing?

4 A. Just pain.

5 Q. Was the pain worse than it was previous
6 before you were hit in the head?

7 A. I would say yes.

8 Q. Was the pain more frequent after you
9 were struck in the head with the baseball bat?

10 A. No, because I was taking aspirin.

11 Q. And the aspirin would help relieve the
12 pain?

13 A. Yes.

14 Q. Mr. Johnson, your Complaint kind of
15 focuses in on March of 2014. So do you recall
16 when you were incarcerated in Stateville in March
17 of 2014 do you recall when you were initially
18 picked up by police officers?

19 A. No.

20 Q. My understanding is prior to coming to
21 Stateville you were in the Will County jail; is
22 that correct?

23 A. I thought I was in Kendall County. I
24 might have been in Will County.

Cedric Johnson

1 Q. Do you recall having a seizure in about
2 February 2014?

3 A. Yes.

4 Q. That seizure was due to a withdrawal
5 from alcohol?

6 A. Yes. That's what they said.

7 Q. I apologize. When I was referring to
8 Stateville before. You were at Jacksonville after
9 that, correct? You were transferred to
10 Jacksonville after your stay in Will County?

11 A. No. I don't recall which county I was
12 in.

13 Q. But ultimately in approximately March of
14 2014 you were transferred to Jacksonville; is that
15 correct?

16 A. Yes, I was in Jacksonville, but I don't
17 know the date.

18 Q. When you first came into Jacksonville do
19 you recall what your vision was like generally at
20 that point in time?

21 A. It was bad.

22 Q. I think I read somewhere in your medical
23 history you had vision at that point of 20/200 so
24 something that was 20 feet away looked like it was

Cedric Johnson

1 200 feet away. Does that jibe with your
2 understanding of your vision at that point in
3 time?

4 A. Yes.

5 Q. Was that in both eyes or just one eye?

6 A. Both my eyes is like messed up. I get
7 black spots in my left eye.

8 Q. That's currently?

9 A. That was from the fight in Stateville.

10 Q. Prior to the fight in Stateville did you
11 have any other issues with your eyes other than
12 poor vision?

13 A. Just poor vision.

14 Q. From the records it appears that the
15 fight that you referenced occurred on March 10,
16 2014. Does that sound right to you?

17 A. Can you rephrase.

18 Q. Sure.

19 Based upon the records that we have
20 my understanding is that the fight that you were
21 referencing earlier occurred on March 10 of 2014.
22 Does that sound right to you?

23 A. Yes.

24 Q. Can you tell me what happened during

Cedric Johnson

1 that fight?

2 A. I was sleeping on my bottom bunk. He
3 told me that I was snoring too loud and he just
4 jumped off the top bunk and just started hitting
5 me while I was sleeping.

6 Q. When you say hitting you, what do you
7 mean by that? Can you describe what he was doing?

8 A. Just punching me in my head and my face,
9 my eyes.

10 Q. Did you take any measures to defend
11 yourself?

12 A. I just tried to hold up my hands.
13 Tried to block him from hitting me. You know,
14 just holding up my hands (indicating).

15 Q. For the record it appears that you're
16 making two fists and holding them in front of you.

17 A. Yeah. In front of my face.

18 Q. Did you do anything else at that point
19 in time?

20 A. Yes. I got -- I made it to the door and
21 started banging on the door yelling for the
22 guards.

23 Q. Was it only the two of you in that cell
24 at that point in time?

Cedric Johnson

1 A. Yes.

2 Q. Let me back up just for a second. Prior
3 to the fight but when you're in Jacksonville can
4 you describe to me how your headaches were?

5 A. It was kind of constant but...

6 Q. When you say constant it wouldn't go
7 away?

8 A. Yes. I think I was taking some
9 medication while I was there that was helping me
10 sleep.

11 Q. How painful were the headaches while you
12 were at Jacksonville prior to your fight?

13 A. It was terrible.

14 Q. We talked about one out of ten before.
15 Can you tell me on that scale between one to ten
16 what the pain felt like?

17 A. I could say another eight.

18 Q. And you were provided medication which
19 helped you sleep at night?

20 A. Yes.

21 Q. So let's go back to the altercation.
22 You mentioned that you got yourself to the door;
23 is that right?

24 A. Yes.

Cedric Johnson

1 Q. And you were pounding on the door; is
2 that right?

3 A. Yes.

4 Q. While you were pounding on the door was
5 the other inmate still attacking you?

6 A. No.

7 Q. And you mentioned that he was hitting
8 you in your head. Was there a general location
9 where he was hitting you or was it all over?

10 A. He grabbed me I would say all over.

11 Q. Was he punching you in your body?

12 A. No. Just in my head area. Face area.

13 Q. So you got to the door and you started
14 pounding on it. What happened next?

15 A. It took awhile before the officers came
16 but they eventually came and they seen both my
17 eyes was bloody.

18 Q. Looks like the records that correctional
19 personnel maybe the nurse who first saw you
20 indicated that you had two small abrasions on your
21 eyelids and that underneath your eyes were
22 swollen. Does that sound right to you?

23 A. Yes.

24 Q. After the correctional officer got to

Cedric Johnson

1 you what happened next?

2 A. He called for some more officers.

3 That's when they walked me down to the medical
4 center things.

5 Q. Approximately how long do you recall it
6 took from the time that the officer appeared at
7 your door until the time you got to the health
8 care unit?

9 A. I could say probably five minutes or so.
10 Something like that.

11 Q. When you got to the health care unit
12 were you first seen by a nurse?

13 A. Yes.

14 Q. She examined you and made an assessment
15 of you?

16 A. Yes.

17 Q. Then after that you saw Dr. Aguinaldo?

18 A. Yes.

19 Q. Dr. Aguinaldo took an assessment of you?

20 A. Yes. Him and the nurse.

21 Q. He prescribed you medication?

22 A. He gave me some ointment.

23 Q. Do you recall if he gave you Tylenol or
24 any sort of pain relief at all?

Cedric Johnson

1 A. No.

2 Q. No, you don't recall, or, no, he did
3 not?

4 A. No, he did not.

5 Q. Did he prescribe you with compresses at
6 all?

7 A. No.

8 Q. And he scheduled you to have an X-ray?

9 A. Yes. They was supposed to send me to
10 the outside clinic but I was put in segregation.

11 Q. When you say outside clinic what do you
12 mean by that?

13 A. To see somebody outside doctor.

14 Q. How did you receive that understanding?

15 A. Because that's what the nurse said.

16 Q. Do you recall which nurse said that?

17 A. No.

18 Q. Do you recall when the nurse said it
19 while you were in the health care unit?

20 A. When I went back for a follow-up she
21 told me I told him you supposed to have been seen
22 outside and went to the outside doctor. And then
23 I was put back in segregation.

24 Q. Do you know which doctor you were

Cedric Johnson

1 supposed to be seen outside for?

2 A. No.

3 Q. Do you know what kind of specialty or
4 what kind of area of practice this outside doctor
5 would be in?

6 A. No.

7 Q. You mentioned that you were in
8 segregation. Can you explain to me why you were
9 in segregation.

10 A. Because of the altercation.

11 Q. You received a disciplinary ticket as a
12 result of the altercation?

13 A. Yes.

14 Q. And you were ultimately found guilty of
15 the disciplinary ticket that was issued to you?

16 A. Yes.

17 Q. Mr. Johnson, you have referenced that
18 you have experienced blind spots in your left eye;
19 is that correct?

20 A. Yes.

21 Q. Can you describe to me what those look
22 like or what you experience?

23 A. I can say it's like white circles that
24 flash across my eye.

Cedric Johnson

1 Q. Are they constant or do they move?

2 A. They constant.

3 Q. Do they stay in one spot or do they move
4 around?

5 A. They move around.

6 Q. When do you notice they move around?

7 A. Like every day.

8 Q. If you move your eye do they move
9 around?

10 A. I really can't explain it.

11 Q. When did you first notice these white
12 circles?

13 A. When I was in the segregation.

14 Q. Do you recall how long after you were in
15 the altercation you started noticing these white
16 spots?

17 A. After the swelling went down in my face.
18 My eyes.

19 Q. How big are these white spots? Are they
20 small, medium sized?

21 A. They are like small.

22 Q. How many are there?

23 A. Like three. I see three sometimes.

24 Q. Has the number or the shape changed at

Cedric Johnson

1 all since you first started noticing them?

2 A. No.

3 Q. After the altercation did you notice any
4 changes with respect to your headaches?

5 A. Yes. They was worser.

6 Q. Can you explain to me how they became
7 worse?

8 A. It was like a reoccurrence of when I --
9 like when I was beat with bats -- with the bat.
10 It was like a reoccurrence all over again.

11 Q. And to back up just a second. I
12 apologize for jumping around. When you saw
13 Dr. Aguinaldo on March 10, 2014, that was the only
14 time you saw Dr. Aguinaldo after the incident?

15 A. Yes. I think so.

16 Q. And you just mentioned that after the
17 incident it started feeling like the same as you
18 got hit with the baseball bat earlier; is that
19 correct?

20 A. Yes.

21 Q. When do you recall that the pain came
22 back or it started feeling like you were hit with
23 a baseball bat?

24 A. It was during the time when I was in

Cedric Johnson

1 segregation.

2 Q. Do you recall if it was a few days after
3 your injury, if it was a few weeks after your
4 injury?

5 A. No, I can't recall.

6 Q. Did it occur at a different time than
7 when you first started seeing the spots or was
8 that around the same time?

9 A. I was getting the headaches immediately.
10 I started seeing the spots when the swelling went
11 down in my face.

12 Q. You noted that the swelling went away
13 eventually?

14 A. Yes.

15 Q. The cuts healed themselves?

16 A. Yes, eventually.

17 Q. Do you recall seeing a physician's
18 assistant a few days after your incident March 14
19 and noting that you were improving?

20 A. I recall seeing a nurse. And she the
21 one that told me that I was supposed to go -- they
22 had supposed to send me outside to the doctor.

23 Q. If the records indicate that you had
24 reported that you were improving would you have

Cedric Johnson

1 any reason to doubt that?

2 A. I don't understand.

3 Q. If the medical records note that you
4 reported to the medical personnel that your
5 condition was improving would you have any reason
6 to doubt that you said that?

7 A. Yes. I would doubt that I said that.

8 Q. Why is that?

9 A. Because I wasn't improving.

10 Q. When you saw the nurse you were given
11 some additional medication; is that right?

12 A. No. I do not recall getting no
13 additional medication.

14 Q. Was any of the medication you were
15 prescribed -- did that help out at all?

16 A. The ointment, no.

17 Q. And you don't recall receiving Tylenol
18 or any sort of pain reliever at all?

19 A. I don't recall.

20 Q. If the medical records state that you
21 were receiving Tylenol or a pain reliever of some
22 sort would you have any reason to doubt that?

23 A. I don't recall it.

24 Q. Looks like you were transferred then to

Cedric Johnson

1 Vienna approximately May of 2014. Is that
2 consistent with your recollection?

3 A. Yes, I was transferred to Vienna. And
4 then I was shipped to Shawnee.

5 Q. When you got to Vienna you were given an
6 intake assessment by medical personnel?

7 A. I think so.

8 Q. During that intake assessment they would
9 do an examination of you; is that correct?

10 A. I don't recall.

11 Q. Do you recall that they interviewed you
12 for your current medical conditions?

13 A. I don't recall that.

14 Q. Do you recall having any conversations
15 with medical personnel while you were at Vienna?

16 A. Yes.

17 Q. Can you tell me when that conversation
18 occurred?

19 A. I talked to a psychiatrist.

20 Q. And during that conversation did you
21 note you sometimes heard ringing in your ears?

22 A. Yes. I think so.

23 Q. Sometimes you heard somebody calling
24 your name?

Cedric Johnson

1 A. Yes.

2 Q. Do you recall any other points of that
3 conversation that you had with the psychiatrist?

4 A. No.

5 Q. Do you recall any other conversations
6 that you had with medical personnel while at
7 Vienna?

8 A. No. I was in segregation in Vienna.

9 Q. Were you in segregation the entire time
10 you were at Vienna?

11 A. Yes.

12 Q. Do you recall how long you stayed at
13 Vienna before transferring over to Shawnee?

14 A. I think maybe a month.

15 Q. While you were at Shawnee do you recall
16 seeing an optometrist?

17 A. I don't know what that is.

18 Q. Do you recall seeing a doctor who was
19 looking at your eyes -- who examined your eyes?

20 A. Yes.

21 Q. If the notes suggest that you saw this
22 doctor in about August of 2014 would that be
23 consistent with your recollection?

24 A. Yes. Probably so.

Cedric Johnson

1 Q. Do you recall how that examination went?

2 A. He told me that he couldn't do nothing
3 for my left eye.

4 Q. Did he tell you that your left eye was
5 normal?

6 A. No.

7 Q. Do you recall what kind of treatment he
8 gave you after his examination?

9 A. I don't recall receiving no treatment
10 from it.

11 Q. He prescribed glasses for you; is that
12 correct?

13 A. I think so. I'm not for sure.

14 Q. Did you receive glasses while you were
15 at Shawnee?

16 A. No. I don't recall receiving no
17 glasses.

18 Q. Do you recall receiving glasses while
19 you were incarcerated in or about 2014 to 2016?

20 A. I received glasses when I was -- when I
21 got out. I remember that.

22 Q. Do you remember who you got the glasses
23 from when you were leaving?

24 A. Dr. Casper I think.

Cedric Johnson

1 Q. Dr. Casper was a private doctor who you
2 saw after your incarceration; is that correct?

3 A. Yes, after my incarceration.

4 MR. TRUBAC: Can we take a quick break when
5 you get to --

6 MR. SKARPIAK: We can take a break right now.

7 (WHEREUPON, a recess was had.)

8 BY MR. SKARPIAK:

9 Q. Mr. Johnson, my understanding is after
10 you were at Shawnee for a period of time you were
11 released from prison. Do I have that right? In
12 about 2015?

13 A. Released from Shawnee, yes.

14 Q. And while you were released it looks
15 like you saw a Dr. Abhishek, A-b-h-i-s-h-e-k. Do
16 I have that correct?

17 MR. TRUBAC: Are you referring to
18 Dr. Abhishek Mehta?

19 BY MR. SKARPIAK:

20 Q. Yes. So it's Dr. Abhishek Mehta,
21 M-e-h-t-a. Abhishek would be the first name.

22 Did you see Dr. Mehta in
23 approximately April of 2015?

24 A. Yes.

Cedric Johnson

1 Q. And Dr. Mehta was your prior physician
2 before you came into DOC custody or were you a new
3 patient at that time?

4 A. I think I was a new patient.

5 Q. And when you were a new patient
6 Dr. Mehta did an evaluation of you and checked out
7 your physical symptoms, correct?

8 A. Yes.

9 Q. And he went through your history with
10 you, correct?

11 A. Yes. I think so.

12 Q. He did an examination of your eyes; is
13 that correct?

14 A. Yes.

15 Q. And he found that there were no
16 abnormalities or decreased vision; is that
17 correct?

18 A. He provided me with a referral to go see
19 an eye doctor.

20 Q. He provided this referral in April of
21 2015?

22 A. I think so.

23 Q. Do you recall Dr. Mehta provided you or
24 ordered X-rays for your knee and your lumbar

Cedric Johnson

1 spine?

2 A. I don't recall.

3 Q. Do you recall seeing Dr. Mehta again in
4 July of 2015?

5 A. July 2015?

6 Q. Correct.

7 A. I can't recall.

8 Q. And then it appears from your records
9 that you were taken back into custody in around I
10 want to say September 2015. Does that sound right
11 to you?

12 A. It might be correct.

13 Q. Do you recall why you were taken back
14 into custody?

15 A. I think it was another retail theft.

16 Q. Then it appears that I think you were in
17 Kendall County initially when you were picked up
18 on your second retail theft; is that right?

19 A. Yes.

20 Q. You were transferred over to
21 Jacksonville?

22 A. From there I think I was transferred
23 over to Stateville then to Jacksonville.

24 Q. So you may have gone to the NRC or

Cedric Johnson

1 Northern Reception Center first?

2 A. Yes.

3 Q. And then over to Jacksonville?

4 A. Yes.

5 Q. Do you recall meeting with a Dr. Khurana
6 over at Jacksonville?

7 A. I can't recall the name.

8 MR. TRUBAC: Can you spell the last name?

9 MR. SKARPIAK: It's K-h-u-r-a-n-a.

10 MR. TRUBAC: Thanks.

11 BY MR. SKARPIAK:

12 Q. While you were at Jacksonville you were
13 seen in a hypertension clinic; is that correct?

14 A. I don't understand what that means.

15 Q. Sure. Did somebody tell you you had
16 high blood pressure?

17 A. Yes.

18 Q. You went to a clinic to treat your high
19 blood pressure.

20 A. Yes.

21 Q. And that would occur every so often you
22 would go to the high blood pressure clinic, right?

23 A. Yes.

24 Q. Do you recall if you had an eye exam

Cedric Johnson

1 done while you were at the hypertension clinic?

2 A. I don't recall but I think I might have.
3 I can't recall that.

4 Q. And do you recall when you were released
5 from Jacksonville?

6 A. I think I would say sometime last year
7 or something like that.

8 Q. You don't recall the specific date,
9 though?

10 A. Right. I don't recall the specific
11 date.

12 Q. Prior to your release from Jacksonville
13 were you trying to get some social security
14 benefits or disability benefits?

15 A. Yes.

16 Q. As part of that did you have an
17 interview or did somebody help facilitate the
18 filling out of those disability forms?

19 A. Yes.

20 MR. SKARPIAK: We'll have this marked as
21 Exhibit A.

22 (WHEREUPON, said document was
23 marked Exhibit A
24 for identification.)

Cedric Johnson

1 BY MR. SKARPIAK:

2 Q. This is a two-page form, Jacksonville
3 242, Jacksonville 243 for the record. Some
4 information has been redacted from the record.

5 Mr. Johnson, have you ever seen
6 this document before?

7 MR. TRUBAC: You can take a minute to review
8 it.

9 BY MR. SKARPIAK:

10 Q. Absolutely. Read through it.

11 A. No. I don't recall seeing this before.

12 Q. Prior to your release from Jacksonville
13 were you interviewed by someone at Jacksonville
14 with respect to potential medical conditions that
15 you were experiencing at that point in time?

16 MR. TRUBAC: Do you understand the question?

17 THE WITNESS: No.

18 BY MR. SKARPIAK:

19 Q. Prior to your release you had mentioned
20 that you were trying to fill out some disability
21 or social security paperwork, correct?

22 A. Yes.

23 Q. Do you recall as part of that paperwork
24 that you were interviewed by an individual at

Cedric Johnson

1 Stateville regarding your medical conditions?

2 A. No, I don't remember. I don't recall.

3 (WHEREUPON, said document was
4 marked Exhibit B
5 for identification.)

6 BY MR. SKARPIAK:

7 Q. Mr. Johnson, this is a two-page document
8 Bates stamped Jacksonville 253 and 254 on the
9 bottom. Can you take a read through this really
10 quick. Let me know when you're finished.

11 A. Yes, I recall it.

12 Q. Is that your handwriting on Exhibit B?

13 A. Yes.

14 Q. And you recall that particular document,
15 Exhibit B?

16 A. Yes, I remember.

17 Q. If you look at the first point that
18 says, A, illnesses, injuries, or conditions
19 limiting your ability to work, and there are
20 several medical symptoms that you have listed
21 after that. Did you put down all the medical
22 symptoms that you were experiencing at that point
23 in time on this worksheet?

24 A. I remember experiencing all this. I

Cedric Johnson

1 remember writing it down.

2 Q. So you wrote down everything that you
3 were experiencing at that point in time?

4 A. Yes. At that time.

5 MR. SKARPIAK: Can we have this marked as
6 Exhibit C.

7 (WHEREUPON, said document was
8 marked Exhibit C
9 for identification.)

10 BY MR. SKARPIAK:

11 Q. Mr. Johnson, this is a two-page
12 document. Actually I'm sorry. A three-page
13 document Jacksonville 249 through 251. Could you
14 take a read through that and let me know when
15 you're finished.

16 A. It's my handwriting.

17 Q. Are you done, sir?

18 A. Yes.

19 Q. Do you recall filling this questionnaire
20 out?

21 A. Yes.

22 Q. And you mentioned before this is your
23 handwriting on this document, correct?

24 A. Yes.

Cedric Johnson

1 Q. And I just want to note on the first --
2 it says, please give a description of your daily
3 activities including required and free time
4 activities. That's on the first page under point
5 I independent activities. And your response is, I
6 try to read but it's hard to concentrate because
7 of the voices and the words moving on the page.
8 Did I quote from that correctly?

9 A. Yes.

10 Q. And is that what you were experiencing
11 at that point in time?

12 MR. TRUBAC: Objection. I don't think we
13 established what that point in time is.

14 BY MR. SKARPIAK:

15 Q. Do you recall when you filled this
16 document out?

17 A. I don't recall the date.

18 Q. Is it likely that this was filled out
19 sometime prior to your release in Jacksonville in
20 2016?

21 A. I don't remember when I filled this out.

22 Q. Do you recall whether or not this
23 document was prepared around the same time as the
24 other social security or disability document that

Cedric Johnson

1 we were looking at previously?

2 A. No. I don't recall.

3 Q. When you were filling this out, though,
4 at the time you were filling this out you were
5 experiencing those symptoms; is that correct?

6 MR. TRUBAC: Objection as to form.

7 BY MR. SKARPIAK:

8 Q. When you filled this out you put down
9 what you were experiencing at that point in time,
10 correct?

11 A. Yes, what I was experiencing at that
12 time.

13 Q. That's true for all the other responses
14 in this document?

15 A. I think so, yes. Yes, this was in
16 Jacksonville.

17 Q. So when you wrote your responses down at
18 the time you were writing those down that's what
19 you were experiencing at that point; is that
20 correct?

21 A. Yes.

22 Q. After you were released from
23 Jacksonville you returned back to Dr. Mehta's
24 care; is that correct?

Cedric Johnson

1 A. Yes.

2 Q. Dr. Mehta had performed an eye exam on
3 you in approximately July of 2016. Does that
4 sound accurate to your recollection?

5 A. Yes.

6 Q. That eye exam came back with no
7 abnormalities; is that correct?

8 MR. TRUBAC: Objection. Asked and answered.

9 You can answer. Go ahead. You can
10 answer the question.

11 THE WITNESS: I just remember when he gave me
12 a referral for the eye doctor.

13 BY MR. SKARPIAK:

14 Q. Do you recall any other conversations
15 that you had with Dr. Mehta regarding your eye
16 care or what you were experiencing with your eyes?

17 A. No, I can't recall.

18 Q. Do you recall when he made that referral
19 to you to the optometrist?

20 A. No.

21 Q. It appears in your records that you saw
22 Dr. Casper in approximately August of 2016. Does
23 that sound consistent with your recollection?

24 A. Yes.

Cedric Johnson

1 Q. And Dr. Casper performed an examination
2 on your eyes?

3 A. Yes.

4 Q. Do you recall anything from that
5 encounter with Dr. Casper?

6 A. No. That he just ordered me some
7 glasses with my left -- with the left eye got a
8 bifocal.

9 Q. Did he provide you with anything else
10 other than glasses?

11 A. No.

12 Q. When you saw Dr. Mehta after you were
13 released from Jacksonville he gave you an
14 examination; is that correct?

15 A. Yes.

16 Q. He discussed with you the symptoms that
17 you were experiencing at that point in time,
18 correct?

19 A. I think so. I'm not for sure.

20 Q. When you were discussing with Dr. Mehta
21 you would provide him an accurate recitation of
22 things you were experiencing at that point in
23 time?

24 A. Yes.

Cedric Johnson

1 Q. You would tell him everything that was
2 potentially wrong with you; is that correct?

3 A. Yes.

4 Q. Same with Dr. Casper?

5 A. Yes.

6 Q. Did you have any complaints about the
7 care that you received from Dr. Mehta or
8 Dr. Casper?

9 A. No.

10 Q. It appears in approximately December of
11 2016 you were sent to St. Joseph's for a seizure
12 that you had. Do you recall that?

13 A. Yes, I recall that.

14 Q. And that seizure was caused because of
15 some alcohol related issue; is that correct?

16 A. Yes, I think so.

17 Q. And do you recall seeing Dr. Mehta after
18 your seizure?

19 A. I can't recall if I went to see him or
20 not.

21 Q. Other than Dr. Mehta and Dr. Casper are
22 you currently seeing any other medical personnel
23 for treatment?

24 A. No.

Cedric Johnson

1 Q. Since you have been released from
2 Stateville have you seen anybody else besides
3 Dr. Mehta and Dr. Casper?

4 A. No.

5 Q. And St. Joseph's, too.

6 A. Yes.

7 Q. Mr. Johnson, while you were in DOC
8 custody is there a process by which you can alert
9 prison officials to issues you were having within
10 the facility?

11 A. Can you repeat that.

12 Q. Are you aware of a grievance process
13 within the Department of Corrections?

14 A. Yes.

15 Q. And the grievance process is a way by
16 which you can write down issues that you were
17 having with prison conditions; is that correct?

18 A. Yes.

19 Q. There's a process through which
20 grievances are processed; is that correct?

21 A. Yes.

22 Q. You're told about that process when you
23 enter into the facility during orientation; is
24 that correct?

Cedric Johnson

1 A. I don't recall.

2 Q. Do you recall what the grievance process
3 in DOC was?

4 A. No, not really.

5 Q. My understanding is you first write out
6 a grievance and submit it for a review; is that
7 correct?

8 A. Yes.

9 Q. And after that a grievance counselor may
10 come back to you and discuss the grievance with
11 you or file a response; is that correct?

12 A. Not with me. I don't recall nobody
13 coming back.

14 Q. Is it your understanding that if the
15 process does not result in a favorable outcome for
16 you that ultimately you should appeal it to the
17 Administrative Review Board, which is located in
18 Springfield?

19 A. I don't recall.

20 Q. Fair enough. Do you recall if you had
21 submitted any sort of documentation to the
22 Department of Corrections Administrative Review
23 Board?

24 A. Yes.

Cedric Johnson

1 Q. When did you do that?

2 A. I tried to do it -- I did it -- I filed
3 the grievance in Stateville. And then I got
4 shipped out. And I filed another grievance
5 because I didn't hear nothing back.

6 Q. Do you recall when you filed your
7 grievance in Stateville?

8 A. I know it was sometime when I was in
9 segregation.

10 Q. Do you recall how you filed your
11 grievance?

12 A. One of the officers gave me a form and I
13 filled it out.

14 Q. What did you do with it after that?

15 A. I turned it in to him.

16 Q. Who did you turn it in to?

17 A. I think his name was Officer Jones. He
18 was the correctional officer in segregation.

19 Q. What was your understanding as to where
20 that document was going to go after that?

21 A. It was going to go to I guess somebody
22 higher.

23 Q. Did you ever receive a response back?

24 A. No. I ended up -- I think I got shipped

Cedric Johnson

1 back out.

2 Q. And then you said you filed a grievance
3 with Shawnee while you were at Shawnee?

4 A. Yes.

5 Q. Do you recall when you filed that
6 grievance?

7 A. I don't recall the date.

8 Q. Do you recall how you turned that
9 grievance in?

10 A. I turned it in to my counselor.

11 Q. You don't recall who the counselor was?

12 A. I think it started with an E. Elvarez.
13 Something like that.

14 Q. Did you receive a response back?

15 A. No.

16 Q. And were those the only two grievances
17 that you filed?

18 A. Yes.

19 Q. And after you initially filed it and you
20 didn't receive a response back did you take any
21 other steps with respect to those two grievances?

22 A. Yes. I wrote the thing to my counselor.
23 And he told me he was going to take care of it but
24 moving me around to different buildings.

Cedric Johnson

1 (WHEREUPON, said document was
2 marked Exhibit D
3 for identification.)

4 BY MR. SKARPIAK:

5 Q. Mr. Johnson, this is a three-page
6 document, Johnson 274 through 276. I'm sorry.
7 Through 277. Could you please take a look through
8 this and let me know when you're finished.

9 A. Yes, I remember all this.

10 Q. The first page Johnson 274 has a
11 resident request slip, which looks like it's dated
12 December 5th of 2014. Is this what you were
13 speaking about earlier when you were trying to
14 bring it to your counselor's attention?

15 A. Yes.

16 Q. And other than filling out this request
17 slip did you take any other actions with respect
18 to the two grievances we discussed previously?

19 A. No. It was my understanding he was
20 going to take care of it.

21 Q. Did you do anything else to follow up
22 with your grievances?

23 A. Besides talk to the people in the law
24 library.

Cedric Johnson

1 Q. We'll look at Johnson 275. Have you had
2 a chance to read through that, Mr. Johnson?

3 A. Yes, I recall this.

4 Q. It actually continues onto the next Page
5 276.

6 A. Okay.

7 Q. Is that your handwriting on these two
8 pages?

9 A. Yes.

10 Q. And it's not signed or dated. Do I have
11 that correct on Page 275?

12 A. Yeah.

13 Q. And you noted on the second page you saw
14 an eye doctor at Shawnee and that the eye doctor
15 told you there was nothing he could do; is that
16 correct?

17 A. Yes. Nothing he could do.

18 Q. And I will just note the last page of
19 this, Johnson 277, appeared to me that this was an
20 attachment to your grievance. Am I right on that?

21 A. I don't recall if it was attached to my
22 grievance or if it was separate.

23 Q. Okay.

24 A. I don't know.

Cedric Johnson

1 Q. And you did not file anything with the
2 Department of Corrections Administrative Review
3 Board in Springfield; is that correct?

4 A. I don't recall. I know I went to the --
5 I had somebody helping me that worked in the law
6 library.

7 Q. You discussed immediately after you had
8 the altercation with the inmate in March of 2014
9 that your headaches came back like it was after
10 you were hit with the bat in 2004. Do you recall
11 that?

12 A. Yes.

13 Q. Since that point in time, March of 2014,
14 have your headaches stayed the same or has it
15 changed at all?

16 A. It go back and forth.

17 Q. So they would come and go?

18 A. Yes.

19 Q. Is that a yes?

20 A. Yes.

21 Q. In terms of severity of how much pain
22 they cause when they come has that changed at all
23 since March of 2014 or has that been the same?

24 A. It's pretty much the same.

Cedric Johnson

1 Q. Do you know or recall what Dr. Mehta has
2 done, if anything, to help out with your
3 headaches?

4 A. He prescribed me some barbiturates. I
5 don't know how to pronounce that.

6 Q. Has that assisted with the pain at all?

7 A. A little bit.

8 Q. And by a little bit do you mean the
9 severity of the headaches, how much pain they
10 cause when they appear?

11 A. Yes, I would say severity.

12 Q. They are still as frequent as they have
13 been?

14 A. Yeah.

15 Q. One other question. Other than this
16 lawsuit do you have any other litigation currently
17 pending?

18 A. No.

19 Q. Have you ever filed a lawsuit against
20 the Department of Corrections or any correctional
21 staff including medical personnel?

22 A. No.

23 Q. Have you ever declared bankruptcy?

24 A. No.

Cedric Johnson

1 MR. SKARPIAK: I don't think I have anything
2 further at this point. I'm sure counsel has some
3 questions for you.

4 MR. TRUBAC: I think I may have a few more
5 questions. Can we take a break?

6 MR. SKARPIAK: Absolutely.

7 (WHEREUPON, a recess was had.)

8 CROSS EXAMINATION

9 BY MR. TRUBAC

10 Q. Mr. Johnson, just for the record, I
11 don't know if we actually stated my name on the
12 record but Steve Trubac representing Plaintiff
13 Cedric Johnson.

14 Mr. Johnson, I just have a few
15 follow-up questions for you. Before we were
16 talking about how bad your headaches were before
17 and after the fight with the inmate at Stateville
18 in March of 2014. Do you remember that?

19 A. Yes.

20 Q. Do you recall how bad -- did you have
21 headaches before the fight?

22 A. Yes, but they weren't so frequent.

23 Q. On a scale of one to ten using opposing
24 counsel's scale how bad would you say that the

Cedric Johnson

1 headaches were before the fight?

2 A. I would say like a four.

3 Q. Did they get worse after the fight?

4 A. Yes.

5 Q. On that same scale of one to ten how bad
6 would you say the headaches were?

7 A. Probably eight or nine.

8 Q. Can you take a look at Exhibit B.

9 A. Yes.

10 Q. Do you remember seeing this document
11 before and being asked questions about it?

12 A. Yes. I can't recall.

13 Q. But I think you testified before that
14 this is your handwriting.

15 A. Yes.

16 Q. Looking at the dates under Section D is
17 it likely that this form was filled out sometime
18 in 2016?

19 A. Yes.

20 Q. So that was after the fight with the
21 inmate, correct?

22 A. Yes.

23 Q. Under Section A where it says list
24 illnesses, injuries, or conditions limiting your

Cedric Johnson

1 ability to work. At this time were you suffering
2 from blind spots in your left eye?

3 A. Yes.

4 Q. Do you know why you didn't list that in
5 this document?

6 A. I don't recall.

7 Q. Were you also suffering from bad
8 headaches at this point?

9 A. Yes.

10 Q. And were those headaches -- do you
11 recall why you didn't list headaches on this list?

12 A. I think I was just running out of spots.
13 But I put like head trauma.

14 Q. Okay. Okay. One more question. Can
15 you turn to Exhibit D. It's the grievance forms.

16 A. Yes.

17 Q. You were talking earlier about following
18 up with your counselor and I think you mentioned
19 his last name started with an E?

20 A. Yes.

21 Q. First page appears to be your request
22 for an interview with Engler?

23 A. Yes.

24 Q. Was Engler your counselor?

Cedric Johnson

1 A. Yes.

2 Q. Did you ever have an in person meeting
3 with this counselor?

4 A. Yes.

5 Q. Do you recall when that was?

6 A. Yes. This was when I was in...

7 Q. Was the in person meeting prior to
8 December of 2014 when you filled out this
9 document?

10 A. Yes. This was prior.

11 Q. And what did you talk about with your
12 counselor?

13 A. I told him about I filed the grievance
14 in Stateville and I haven't gotten no response
15 yet.

16 Q. What did he say?

17 A. He said he was going to take care of it.

18 Q. Did you ever hear back from him?

19 A. No.

20 Q. You also mentioned that you were asking
21 some of the people in the law library -- I'm
22 sorry -- the prison library to help you follow up;
23 is that correct?

24 A. Yes.

Cedric Johnson

1 Q. Do you know what they did to try and
2 follow up with the counselor?

3 A. Yes. They made some calls and they
4 spoke to the head lady of the law library.

5 Q. Prison library?

6 A. Yes.

7 Q. And were they trying to follow up on the
8 status of your grievance? Is that what you asked
9 them to do?

10 A. Yes.

11 Q. Did you ever receive a rely?

12 A. No.

13 MR. TRUBAC: That's all I have.

14 REDIRECT EXAMINATION

15 BY MR. SKARPIAK

16 Q. Mr. Johnson, just one quick question on
17 Exhibit B. Do you have that in front of you, sir?

18 A. Yes.

19 Q. On the top of the page there is some
20 instructions right there, correct?

21 A. Yes.

22 Q. The last sentence says, if you need more
23 space use blank sheets of paper. Do you see that?

24 A. Yes.

Cedric Johnson

1 MR. SKARPIAK: I don't think I have anything
2 further.

3 MR. TRUBAC: We'll review.

4 THE REPORTER: Do you need this transcript?

5 MR. SKARPIAK: Yes, we'll have a condensed
6 please, PDF.

7 MR. TRUBAC: Same for me.

8 (The deposition concluded at 2:50.)

9 FURTHER DEPONENT SAITH NOT.

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24

Cedric Johnson

GEORGE E. RYDMAN & ASSOCIATES, LTD.
15 West Jefferson Street
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815-727-4363

June 21, 2017

Mr. Cedric Johnson
c/o Mr. Steven Trubac
Bryan Cave, LLP
161 North Clark Street, Suite 4300
Chicago, Illinois 60601

Re: Johnson vs. Aguinaldo, 15CV885

Dear Mr. Johnson:

Please find enclosed herein a copy of your deposition transcript taken on 6/12/17, which you desired to read and sign.

Please read the transcript carefully and on the enclosed correction sheet, indicating the page number and line number, list any change you feel necessary and the reason for that change.

When you have completed reading the transcript, sign the Signature Page which we have enclosed and have your signature notarized by a Notary Public.

Please return the enclosed Signature Page and the correction sheet to this office within 28 days, as required by Statute. We will then forward any corrections and the Signature Page to all parties concerned.

Your prompt attention in regard to this matter is greatly appreciated.

Yours very truly,

GEORGE E. RYDMAN & ASSOC., LTD.

By: Michele A. Borello
MICHELE A. BORELLO, CSR, RPR

cc: Mr. Chad M. Skarpiak

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CEDRIC LYN JOHNSON (B18840),)
)
 Plaintiff,)
)
 vs.) No. 15CV885
)
 EVARISTO AGUINALDO,)
)
 Defendant.)

I hereby certify that I have read the foregoing transcript of my deposition given at the time and place aforesaid, inclusive, and I do again subscribe and make oath that the same is a true, correct, and complete transcript of my deposition so given as aforesaid, and includes changes, if any, so made by me.

SUBSCRIBED AND SWORN TO
before me this _____ day
of _____,
A.D., 2017.

Notary Public

Cedric Johnson

1	WITNESS COMMENT SHEET	
2	NAME: CEDRIC JOHNSON	
3	Date of Deposition: 6/12/17	
4	RE: Johnson vs. Aguinaldo	
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6	Line_____	Reason_____
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22	_____	_____
23	Date	Name
24		


Cedric Johnson

1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF W I L L)

3 I, Michele A. Borello, a Registered
4 Professional Reporter and Certified Shorthand
5 Reporter for the State of Illinois, do hereby
6 certify that CEDRIC JOHNSON was first duly sworn
7 by me to testify to the truth; that the above
8 deposition was recorded stenographically and
9 reduced to typewriting by me; and that the
10 foregoing transcript of the said deposition is a
11 true and correct transcript of the testimony given
12 by the said witness at the time and place
13 previously specified.

14 I further certify that I am not
15 counsel for nor in any way related to any of the
16 parties to this suit, nor am I in any way
17 interested in the outcome thereof.

18 In witness thereof, I have hereunto
19 set my hand this 21st day of June, 2017.

20 
21



22 Michele A. Borello, CSR, RPR

23 CSR License No. 084-004218
24

Cedric Johnson

A	15:19 45:8	attacking 24:5	benefits 39:14,14	captioned 3:12
A-b-h-i-s-h-e-k	answering 5:4	attention 52:14	best 5:7 13:7,10	care 25:8,11
35:15	answers 4:6	62:18	15:4	26:19 44:24
A.D 1:19 63:19	anticipate 5:1	attorney 6:18	better 17:10,11,17	45:16 47:7
Abhishek 35:15	anybody 48:2	7:14	17:21,23,24	51:23 52:20
35:18,20,21	apologize 10:23	attorneys 12:1	bifocal 46:8	59:17
ability 41:19 58:1	20:7 29:12	August 33:22	big 28:19	carefully 62:11
able 6:6	Apparently 15:3	45:22	bit 14:1,16 55:7,8	carry 5:11
abnormalities	appeal 49:16	aunt's 10:1	black 21:7	case 3:12
36:16 45:7	appear 55:10	aware 48:12	blank 60:23	Casper 34:24 35:1
abrasions 24:20	appeared 25:6	awhile 24:15	blind 27:18 58:2	45:22 46:1,5
Absolutely 18:11	53:19		block 22:13	47:4,8,21 48:3
40:10 56:6	appears 13:8	B	blood 38:16,19,22	categories 7:4
accurate 45:4	21:14 22:15	B 2:15,17 41:4,12	bloody 24:17	cause 54:22 55:10
46:21	37:8,16 45:21	41:15 57:8	Board 49:17,23	caused 47:14
actions 52:17	47:10 58:21	60:17	54:3	Cave 2:2 62:6
activities 43:3,4,5	applicable 3:17	B18840 1:3 7:22	body 24:11	caveat 5:23
additional 31:11	application 11:23	63:3	Bolingbrook 9:4	cc 62:23
31:13	apply 3:18	back 14:12 15:15	14:9	Cedric 1:3,9,10
Administrative	appreciated 62:18	15:15 16:16	Borello 1:11	2:12 3:3,10,12
49:17,22 54:2	appropriately	18:15 23:2,21	62:22 65:3,22	56:13 62:5 63:3
affirmatively 4:17	5:19	26:20,23 29:11	bottom 22:2 41:9	63:17 64:1 65:6
aforsaid 63:11	approximately	29:22 37:9,13	Boxwood 7:24 8:7	cell 22:23
63:14	9:18 14:3,10	44:23 45:6	9:8,22 10:2	center 25:4 38:1
afternoon 3:19	20:13 25:5 32:1	49:10,13 50:5	Boy 9:1,2	Certified 1:11
6:3	35:23 45:3,22	50:23 51:1,14	break 5:21 6:1	65:4
agreement 3:17	47:10	51:20 54:9,16	18:8,10 35:4,6	certify 63:9 65:6
Aginaldo 1:6	April 14:3 35:23	59:18	56:5	65:14
3:13,21 13:17	36:20	bad 20:21 56:16	briefly 12:18	Chad 2:6 3:20
25:17,19 29:13	area 24:12,12	56:20,24 57:5	bring 52:14	12:24 62:23
29:14 62:8 63:6	27:4	58:7	brothers 8:6	chance 5:9 53:2
64:2	arrest 9:23	banging 22:21	brothers' 8:13	change 17:7 18:23
ahead 45:9	asked 5:23 15:19	bankruptcy 55:23	Bryan 2:2 62:6	62:12,13 64:3,5
alcohol 6:10 20:5	45:8 57:11 60:8	barbiturates 55:4	buildings 51:24	64:6,8,9,11,12
47:15	asking 4:23 59:20	baseball 19:9	bullet 14:21,22	64:14,15,17,18
alert 48:8	aspirin 19:10,11	29:18,23	bunk 22:2,4	64:20
aliases 7:19	assessment 25:14	based 14:2 21:19		changed 28:24
altercation 13:18	25:19 32:6,8	bat 16:16 18:2,16	C	54:15,22
23:21 27:10,12	assistant 30:18	19:9 29:9,18,23	C 2:1,18 3:13 42:6	changes 19:2 29:4
28:15 29:3 54:8	assisted 55:6	54:10	42:8	63:15
amended 7:9	ASSOC 62:20	Bates 41:8	c/o 62:5	chart 12:20
12:24	ASSOCIATES	bats 29:9	Caesars 10:21	checked 36:6
answer 4:13 5:4,5	62:1	beat 29:9	11:3	Chicago 2:3,7
5:10,11,17,24	assume 5:18	beginning 17:14	called 25:2	9:24 62:7
12:15 45:9,10	attached 53:21	behalf 2:4,8	calling 32:23	children 8:21,23
answered 5:8,19	attachment 53:20	believe 14:13	calls 60:3	circles 27:23

Cedric Johnson

28:12 Civil 1:14 claim 13:20 Clark 2:3 62:6 clean 4:5,8,22 clear 4:15 5:4 client 13:17 clinic 26:10,11 38:13,18,22 39:1 coma 16:17 18:20 18:22 come 16:8,9,10 49:10 54:17,22 coming 6:23 19:20 49:13 commencing 1:18 COMMENT 64:1 complaint 6:21 7:6,8,10,11 13:17 19:14 complaints 47:6 complete 13:8 63:13 completed 62:13 completely 5:3,8 comprehending 5:14 compresses 26:5 concentrate 43:6 concerned 62:17 concluded 61:8 condensed 61:5 condition 31:5 conditions 32:12 40:14 41:1,18 48:17 57:24 confused 5:15 consistent 32:2 33:23 45:23 constant 16:7 17:8 23:5,6 28:1 28:2 consumed 6:9 continues 53:4 conversation	32:17,20 33:3 conversations 32:14 33:5 45:14 convicted 12:10 copy 62:10 correct 9:19 12:22 13:22 14:5,17 16:17 19:22 20:9,15 27:19 29:19 32:9 34:12 35:2,16 36:7,10,13,17 37:6,12 38:13 40:21 42:23 44:5,10,20,24 45:7 46:14,18 47:2,15 48:17 48:20,24 49:7 49:11 53:11,16 54:3 57:21 59:23 60:20 63:13 65:11 correction 62:12 62:16 correctional 24:18,24 50:18 55:20 corrections 48:13 49:22 54:2 55:20 62:17 correctly 43:8 counsel 4:6 12:3 56:2 65:15 counsel's 56:24 counselor 49:9 51:10,11,22 58:18,24 59:3 59:12 60:2 counselor's 52:14 county 19:21,23 19:24 20:10,11 37:17 65:2 couple 11:4 court 1:1,15 3:15 4:3 63:1	crime 12:9 criminal 12:23 13:8 Cross 2:13 56:8 CSR 62:22 65:22 65:23 cue 4:20 CUNNINGHAM 2:6 current 9:10 32:12 currently 3:14 7:17,23 8:17 9:3 11:24 21:8 47:22 55:16 custody 36:2 37:9 37:14 48:8 cuts 30:15 <hr/> D D 2:10,18 52:2 57:16 58:15 daily 43:2 date 20:17 39:8 39:11 43:17 51:7 63:8 64:2 64:22 dated 52:11 53:10 dates 11:6 57:16 day 15:8,10 17:5 28:7 63:18 65:19 days 30:2,18 62:16 Dear 62:9 December 47:10 52:12 59:8 declared 55:23 decrease 17:14 decreased 36:16 defend 22:10 defendant 1:7 2:8 3:20 63:7 Department 48:13 49:22 54:2 55:20	DEPONENT 61:9 deposed 3:21 deposition 1:9,10 3:11 4:1 6:12,14 7:2,15 61:8 62:10 63:8,10 63:14 64:2 65:8 65:10 depositions 1:16 describe 15:11,17 15:22 22:7 23:4 27:21 description 43:2 desired 62:11 different 30:6 51:24 Direct 2:12 3:6 disability 11:17 11:20 12:2,7 39:14,18 40:20 43:24 disciplinary 27:11 27:15 discovery 1:9,17 discuss 49:10 discussed 46:16 52:18 54:7 discussing 46:20 District 1:1,1 3:14 3:15 63:1,1 Division 1:2 3:16 63:2 DOC 36:2 48:7 49:3 doctor 18:6 26:13 26:22,24 27:4 30:22 33:18,22 35:1 36:19 45:12 53:14,14 document 12:16 39:22 40:6 41:3 41:7,14 42:7,12 42:13,23 43:16 43:23,24 44:14 50:20 52:1,6 57:10 58:5 59:9	documentation 6:13 49:21 documents 6:17 6:19,21 7:5,12 doing 4:11 22:7 door 22:20,21 23:22 24:1,4,13 25:7 doubt 31:1,6,7,22 Dr 3:21 13:17 25:17,19 29:13 29:14 34:24 35:1,15,18,20 35:22 36:1,6,23 37:3 38:5 44:23 45:2,15,22 46:1 46:5,12,20 47:4 47:7,8,17,21,21 48:3,3 55:1 Drive 2:7 drugs 6:10 due 20:4 duly 3:4 65:6 <hr/> E E 2:1,1,10,15 51:12 58:19 62:1,20 ear 14:16 15:2 earlier 21:21 29:18 52:13 58:17 ears 32:21 East 2:7 Eastern 1:2 3:16 63:2 education 10:4 effects 15:1 eight 16:6 23:17 57:7 either 4:19 Elvarez 51:12 emphasize 4:19 employed 10:24 11:7,10 employment
--	---	--	---	---

Cedric Johnson

10:19 enclosed 62:10,12 62:14,15 encounter 46:5 ended 50:24 Engler 58:22,24 enter 48:23 entire 33:9 established 43:13 evaluation 36:6 EVARISTO 1:6 63:6 eventually 24:16 30:13,16 exam 38:24 45:2,6 examination 2:11 2:12,13,13 3:6 32:9 34:1,8 36:12 46:1,14 56:8 60:14 examined 3:4 25:14 33:19 excruciating 16:3 exhibit 2:17,17,18 2:18 13:12 39:21,23 41:4 41:12,15 42:6,8 52:2 57:8 58:15 60:17 experience 27:22 experienced 16:3 27:18 experiencing 18:24 19:3 40:15 41:22,24 42:3 43:10 44:5 44:9,11,19 45:16 46:17,22 explain 27:8 28:10 29:6 eye 21:5,7 27:18 27:24 28:8 34:3 34:4 36:19 38:24 45:2,6,12 45:15 46:7 53:14,14 58:2	eyelids 24:21 eyes 21:5,6,11 22:9 24:17,21 28:18 33:19,19 36:12 45:16 46:2 <hr/> F <hr/> face 22:8,17 24:12 28:17 30:11 facilitate 39:17 facility 48:10,23 fair 4:9 5:5,11,19 6:1 7:13 49:20 fall 16:24 far 4:11 11:21 favorable 49:15 February 20:2 Federal 3:17 feel 62:12 feeling 15:18,23 16:4 29:17,22 feet 20:24 21:1 felt 15:12,13 17:22 23:16 fight 17:16,18 21:9,10,15,20 22:1 23:3,12 56:17,21 57:1,3 57:20 file 49:11 54:1 filed 50:2,4,6,10 51:2,5,17,19 55:19 59:13 fill 40:20 filled 43:15,18,21 44:8 50:13 57:17 59:8 filling 39:18 42:19 44:3,4 52:16 find 11:1 62:10 finished 4:23 5:3 41:10 42:15 52:8 firm 12:5 first 3:4 13:2	20:18 24:19 25:12 28:11 29:1 30:7 35:21 38:1 41:17 43:1 43:4 49:5 52:10 58:21 65:6 fists 22:16 five 25:9 flash 27:24 flip 12:19 focuses 19:15 folks 4:14 follow 52:21 59:22 60:2,7 follow-up 26:20 56:15 following 58:17 follows 3:5 foregoing 63:10 65:10 form 40:2 44:6 50:12 57:17 forms 39:18 58:15 forth 54:16 forward 62:17 found 27:14 36:15 four 16:13 57:2 fragments 14:21 free 43:3 frequency 17:13 frequent 19:8 55:12 56:22 frequently 16:10 17:12 18:2 front 22:16,17 60:17 further 56:2 61:2 61:9 65:14 <hr/> G <hr/> G.E.D 10:6,7 general 24:8 generally 10:18 20:19 GEORGE 62:1 62:20	getting 11:20 17:17,21,23,24 18:18 30:9 31:12 girl 9:1,2 give 3:23 4:12 43:2 given 31:10 32:5 63:10,14 65:11 glasses 34:11,14 34:17,18,20,22 46:7,10 go 7:19 16:8,9,10 23:6,21 30:21 36:18 38:22 45:9 50:20,21 54:16,17 going 4:1 5:1 11:19 12:14 13:11 50:20,21 51:23 52:20 59:17 Good 3:19 gotten 59:14 grabbed 24:10 great 4:11 greatly 62:18 grievance 7:11 48:12,15 49:2,6 49:9,10 50:3,4,7 50:11 51:2,6,9 53:20,22 58:15 59:13 60:8 grievances 48:20 51:16,21 52:18 52:22 ground 3:23 guards 22:22 guess 50:21 guilty 27:14 gunshot 14:4,7 <hr/> H <hr/> H 2:15 hand 12:14 65:19 hands 22:12,14	handwriting 41:12 42:16,23 53:7 57:14 handwritten 7:8 happen 16:11 happened 21:24 24:14 25:1 happy 5:22 hard 43:6 head 14:5,10,22 15:15,16 16:16 18:15 19:6,9 22:8 24:8,12 58:13 60:4 headaches 15:3,4 15:12 16:5 17:7 17:22 18:2,5,23 23:4,11 29:4 30:9 54:9,14 55:3,9 56:16,21 57:1,6 58:8,10 58:11 healed 30:15 health 25:7,11 26:19 hear 15:2 50:5 59:18 heard 32:21,23 help 19:11 31:15 39:17 55:2 59:22 helped 23:19 helping 23:9 54:5 hereunto 65:18 high 38:16,18,22 higher 50:22 highest 10:4 history 10:19 12:23 13:8,9 14:1 20:23 36:9 hit 19:6 29:18,22 54:10 hitting 22:4,6,13 24:7,9 hold 22:12 holding 22:14,16
--	--	---	---	---

Cedric Johnson

15:8 17:2 hour 1:18 hours 6:10 house 9:23 10:1 huh-uh 4:14 hypertension 38:13 39:1	initially 7:9 19:17 37:17 51:19 injuries 41:18 57:24 injury 14:20 17:3 18:14 30:3,4 inmate 7:21 13:19 24:5 54:8 56:17 57:21 instructions 60:20 insufficient 13:20 intake 32:6,8 interested 65:17 interrogatories 12:16 interrogatory 13:1 interrupt 5:9 interview 39:17 58:22 interviewed 32:11 40:13,24 issue 47:15 issued 27:15 issues 21:11 48:9 48:16	8:14 9:7,17 12:14 13:16 19:14 27:17 35:9 40:5 41:7 42:11 48:7 52:5 52:6,10 53:1,2 53:19 56:10,13 56:14 60:16 62:5,8,9 63:3,17 64:1,2 65:6 Joliet 1:18 62:2 Jones 50:17 Joseph's 47:11 48:5 July 37:4,5 45:3 jump 5:2 jumped 18:18 22:4 jumping 29:12 June 1:19 62:3 63:8 65:19	L-e-o 8:15,16 Labor 10:20 11:2 lady 60:4 Lane 7:24 8:7 law 52:23 54:5 59:21 60:4 lawsuit 55:16,19 leaving 34:23 left 15:8 21:7 27:18 34:3,4 46:7,7 58:2 Leo 8:14 let's 23:21 level 10:4 library 52:24 54:6 59:21,22 60:4,5 License 65:23 life 10:18 likewise 5:7 limiting 41:19 57:24 line 62:12 64:4,5 64:7,8,10,11,13 64:14,16,17,19 64:20 lingering 14:24 LINK 11:14,16 list 10:24 57:23 58:4,11,11 62:12 listed 41:20 lists 12:20 litigation 55:16 little 4:16 10:20 11:3 14:1,16 55:7,8 live 8:1,3,7 9:3,5 lived 9:7,10,21 LLP 2:2 62:6 Local 3:18 located 15:14 49:17 location 24:8 long 9:7 18:19 25:5 28:14 33:12	look 4:16 17:5 27:21 41:17 52:7 53:1 57:8 looked 20:24 looking 33:19 44:1 57:16 looks 13:5 14:16 24:18 31:24 35:14 52:11 loud 15:2 22:3 Loyola 14:3 lumbar 36:24 Lyn 1:3 3:10 63:3
I	J	K	M	
ID 2:16 identification 39:24 41:5 42:9 52:3 IDOC 7:21 IL 62:2 Illinois 1:1,14,18 2:3,7 3:15 7:24 9:4 62:7 63:1 65:1,5 illnesses 41:18 57:24 immediately 14:23 30:9 54:7 important 4:2,4 5:13 improving 30:19 30:24 31:5,9 incarcerated 19:16 34:19 incarceration 9:11,12 10:17 12:9,10 35:2,3 incident 16:19 17:15 18:17 29:14,17 30:18 includes 63:14 including 43:3 55:21 inclusive 63:11 independent 43:5 indicate 30:23 indicated 24:20 indicating 14:12 22:14 62:12 individual 40:24 information 40:4	J-o-b-e-r-t-a 8:12 Jacksonville 20:8 20:10,14,16,18 23:3,12 37:21 37:23 38:3,6,12 39:5,12 40:2,3 40:12,13 41:8 42:13 43:19 44:16,23 46:13 jail 19:21 Jefferson 1:17 62:1 jibe 21:1 job 4:11 Joberta 8:10 Johnson 1:3,9,10 2:12 3:3,10,12 3:13,19 8:10,14	K-h-u-r-a-n-a 38:9 Kendall 19:23 37:17 Khurana 38:5 kind 6:19 7:1 13:5 13:24 19:2,14 23:5 27:3,4 34:7 knee 36:24 know 5:10,17,22 11:23 12:22 16:19 20:17 22:13 26:24 27:3 33:17 41:10 42:14 50:8 52:8 53:24 54:4 55:1,5 56:11 58:4 60:1 knowledge 13:7 13:10	mark 13:11 marked 2:16 39:20,23 41:4 42:5,8 52:2 married 8:17,19 matter 62:18 mean 22:7 26:12 55:8 means 38:14 measures 22:10 medical 6:22 7:1 7:3,12 10:10,12 14:1 20:22 25:3 31:3,4,20 32:6 32:12,15 33:6 40:14 41:1,20 41:21 47:22 55:21 medication 6:9 23:9,18 25:21 31:11,13,14 medium 28:20 meeting 38:5 59:2	
		L		
		L 65:2,2		

Cedric Johnson

59:7 Mehta 35:18,20 35:22 36:1,6,23 37:3 45:2,15 46:12,20 47:7 47:17,21 48:3 55:1 Mehta's 44:23 mentioned 23:22 24:7 27:7 29:16 40:19 42:22 58:18 59:20 messed 21:6 MEYER 2:6 Meyers 12:4 Michele 1:11 62:22 65:3,22 mid 5:10 migraines 15:13 Miler 12:4 military 10:14 minimal 16:2 minute 40:7 minutes 25:9 month 33:14 months 9:24 mother 8:4 9:5 mother's 8:9 move 28:1,3,5,6,8 28:8 moving 5:8 43:7 51:24 muddled 4:16	new 36:2,4,5 night 23:19 nine 57:7 normal 34:5 North 2:3 62:6 Northern 1:1 3:15 38:1 63:1 notarized 62:14 Notary 1:13 62:15 63:20 note 5:13 31:3 32:21 43:1 53:18 noted 30:12 53:13 notes 33:21 notice 3:16 14:24 17:13 28:6,11 29:3 noticed 17:17 noticing 28:15 29:1 noting 30:19 NRC 7:3 37:24 number 2:16 7:21 28:24 62:12,12 nurse 24:19 25:12 25:20 26:15,16 26:18 30:20 31:10	24:15 25:2 50:12 officials 48:9 ointment 25:22 31:16 Okay 13:14 53:6 53:23 58:14,14 old 7:17 8:23 Once 18:22 opposing 56:23 optometrist 33:16 45:19 ordered 36:24 46:6 orientation 48:23 outcome 49:15 65:17 outside 26:10,11 26:13,22,22 27:1,4 30:22	parties 3:17 62:17 65:16 patient 36:3,4,5 payments 11:12 11:17 PDF 61:6 pending 3:14 55:17 people 12:7 52:23 59:21 performed 45:2 46:1 period 9:11 12:8 17:5,8,22 35:10 periods 10:17 person 4:2 59:2,7 personnel 24:19 31:4 32:6,15 33:6 47:22 55:21 pertaining 1:16 physical 36:7 physician 36:1 physician's 30:17 picked 19:18 37:17 Pizza 10:21 11:3 place 63:11 65:12 placed 16:17 places 11:4 Plainfield 7:24 plaintiff 1:4 2:4 3:12 56:12 63:4 plea 12:12 pleaded 12:13 please 3:8 4:23 5:10,16,24 43:2 52:7 61:6 62:10 62:11,15 point 5:13 20:20 20:23 21:2 22:18,24 40:15 41:17,22 42:3 43:4,11,13 44:9 44:19 46:17,22 54:13 56:2 58:8	points 33:2 police 19:18 poor 21:12,13 potential 40:14 potentially 47:2 pounding 24:1,4 24:14 practice 27:4 preparation 6:13 7:14 prepared 43:23 prescribe 26:5 prescribed 18:6 25:21 31:15 34:11 55:4 pressure 38:16,19 38:22 pretty 54:24 previous 12:23 19:5 previously 44:1 52:18 65:13 prior 6:12 7:2 19:20 21:10 23:2,12 36:1 39:12 40:12,19 43:19 59:7,10 prison 9:18 10:8 11:9 35:11 48:9 48:17 59:22 60:5 private 35:1 probably 15:10 16:13 25:9 33:24 57:7 Procedure 1:14 proceed 4:1 process 11:19,21 48:8,12,15,19 48:22 49:2,15 processed 48:20 Professional 1:12 65:4 prompt 62:18 pronounce 55:5 provide 46:9,21
<hr/> N <hr/> N 2:1,10 name 3:8,20 8:9 12:5 32:24 35:21 38:7,8 50:17 56:11 58:19 64:1,22 names 7:19 8:13 necessary 62:13 need 5:21 18:8 60:22 61:4 negative 4:18	<hr/> O <hr/> o'clock 1:19 oath 6:3,4 63:12 Objection 15:19 43:12 44:6 45:8 Objections 13:3 occur 30:6 38:21 occurred 14:8 16:20,23 21:15 21:21 32:18 occurring 17:12 offenses 12:21 office 62:16 officer 24:24 25:6 50:17,18 officers 19:18	<hr/> P <hr/> P 2:1,1 P.C 2:6 page 3:24 12:20 43:4,7 52:10 53:4,11,13,18 58:21 60:19 62:12,14,15,17 64:3,5,6,8,9,11 64:12,14,15,17 64:18,20 pages 53:8 pain 15:14,17,23 16:2,3,4,7 17:7 19:4,5,8,12 23:16 25:24 29:21 31:18,21 54:21 55:6,9 painful 15:24 23:11 paper 60:23 paperwork 40:21 40:23 part 39:16 40:23 particular 41:14		

Cedric Johnson

provided 23:18 36:18,20,23 provisions 1:13 psychiatrist 32:19 33:3 Public 1:13 62:15 63:20 punching 22:8 24:11 purpose 1:17 pursuant 1:13 3:16 put 16:4,6 26:10 26:23 41:21 44:8 58:13	recall 6:19 7:1,21 11:5,6 13:4 17:2 17:4 18:3,4,7,16 18:19 19:15,17 20:1,11,19 25:5 25:23 26:2,16 26:18 28:14 29:21 30:2,5,17 30:20 31:12,17 31:19,23 32:10 32:11,13,14 33:2,5,12,15,18 34:1,7,9,16,18 36:23 37:2,3,7 37:13 38:5,7,24 39:2,3,4,8,10 40:11,23 41:2 41:11,14 42:19 43:15,17,22 44:2 45:14,17 45:18 46:4 47:12,13,17,19 49:1,2,12,19,20 50:6,10 51:5,7,8 51:11 53:3,21 54:4,10 55:1 56:20 57:12 58:6,11 59:5 receive 10:7 11:12 11:16,17 26:14 34:14 50:23 51:14,20 60:11 received 10:5 13:19 18:15 27:11 34:20 47:7 receiving 11:14 18:5 31:17,21 34:9,16,18 Reception 38:1 recess 18:12 35:7 56:7 recitation 46:21 recollection 15:5 32:2 33:23 45:4 45:23	record 3:9 4:5,8 4:22 22:15 40:3 40:4 56:10,12 recorded 65:8 records 6:22 7:2,3 14:2 21:14,19 24:18 30:23 31:3,20 37:8 45:21 redacted 40:4 Redirect 2:13 60:14 reduced 65:9 referenced 21:15 27:17 referencing 21:21 referral 36:18,20 45:12,18 referring 20:7 35:17 regard 62:18 regarding 41:1 45:15 Registered 1:12 65:3 related 47:15 65:15 release 9:11,21 11:9 39:12 40:12,19 43:19 released 9:18 35:11,13,14 39:4 44:22 46:13 48:1 relief 25:24 relieve 19:11 reliever 31:18,21 rely 60:11 remember 34:21 34:22 41:2,16 41:24 42:1 43:21 45:11 52:9 56:18 57:10 reoccurrence 29:8 29:10	repair 14:19 repeat 11:15 48:11 rephrase 9:13 10:11 21:17 reported 30:24 31:4 reporter 1:12,12 4:3 61:4 65:4,5 represent 3:20 representing 56:12 request 52:11,16 58:21 required 43:3 62:16 reside 7:23 resident 52:11 respect 29:4 40:14 51:21 52:17 responding 4:24 response 4:12 43:5 49:11 50:23 51:14,20 59:14 responses 13:1,3 44:13,17 result 14:4 17:3 27:12 49:15 resuscitation 12:22 retail 12:11 37:15 37:18 return 62:15 returned 44:23 review 6:13,22 7:4 12:21 40:7 49:6,17,22 54:2 61:3 reviewed 6:16,17 7:2 right 4:2 11:1 13:5 14:12,13 14:15 15:6,7 21:16,22 23:23 24:2,22 31:11	35:6,11 37:10 37:18 38:22 39:10 53:20 60:20 ringing 15:2 32:21 Robert 8:14 room 4:2,15 RPR 62:22 65:22 rules 1:14,15 3:18 3:23 running 58:12 RYDMAN 62:1 62:20	
Q			S		
question 4:24 5:1 5:3,4,5,9,15,15 5:18,23 9:14 17:20 40:16 45:10 55:15 58:14 60:16 questionnaire 42:19 questions 4:5,7,12 56:3,5,15 57:11 quick 35:4 41:10 60:16 quote 43:8			S 2:1,15 SAITH 61:9 saw 24:19 25:17 29:12,14 31:10 33:21 35:2,15 45:21 46:12 53:13 saying 4:4,15,17 11:2 says 41:18 43:2 57:23 60:22 scale 16:1 23:15 56:23,24 57:5 scheduled 26:8 second 23:2 29:11 37:18 53:13 Section 57:16,23 security 11:12 39:13 40:21 43:24 see 26:13 28:23 35:22 36:18 47:19 60:23 seeing 30:7,10,17 30:20 33:16,18 37:3 40:11 47:17,22 57:10 seen 12:16 24:16 25:12 26:21 27:1 38:13 40:5		
R					
R 2:1 read 20:22 40:10 41:9 42:14 43:6 53:2 62:11,11 63:9 reading 62:13 Ready 10:20 11:2 really 28:10 41:9 49:4 reason 6:6 31:1,5 31:22 62:13 64:4,5,7,8,10,11 64:13,14,16,17 64:19,20					

Cedric Johnson

48:2 segregation 26:10 26:23 27:8,9 28:13 30:1 33:8 33:9 50:9,18 seizure 20:1,4 47:11,14,18 send 26:9 30:22 sense 4:20 16:22 sent 47:11 sentence 60:22 sentences 12:21 separate 53:22 September 37:10 serve 10:14 set 65:19 severity 15:22 18:4,7 54:21 55:9,11 shape 28:24 Shawnee 32:4 33:13,15 34:15 35:10,13 51:3,3 53:14 sheet 62:12,16 64:1 sheets 60:23 shipped 32:4 50:4 50:24 shortcut 10:22 Shorthand 1:11 65:4 shot 14:11,23 15:6,7 16:5 17:6 side 14:14,15 sign 62:11,14 signature 62:14 62:14,15,17 signed 53:10 sir 7:17 42:17 60:17 sitting 6:12 sized 28:20 Skarpiak 2:6,12 2:13 3:7,20 9:15 9:16 13:2,6,13	13:15 15:20,21 18:11,13 35:6,8 35:19 38:9,11 39:20 40:1,9,18 41:6 42:5,10 43:14 44:7 45:13 52:4 56:1 56:6 60:15 61:1 61:5 62:23 sleep 23:10,19 sleeping 22:2,5 slip 52:11,17 small 24:20 28:20 28:21 snoring 22:3 social 11:12 39:13 40:21 43:24 somebody 26:13 32:23 38:15 39:17 50:21 54:5 sorry 11:15 42:12 52:6 59:22 sort 25:24 31:18 31:22 49:21 sound 21:16,22 24:22 37:10 45:4,23 space 60:23 speak 7:13 speaking 52:13 specialty 27:3 specific 5:16 11:6 39:8,10 specified 65:13 spell 8:11 38:8 spine 37:1 spoke 60:4 spot 28:3 spots 21:7 27:18 28:16,19 30:7 30:10 58:2,12 spring 16:23 Springfield 49:18 54:3 SS 65:1	St 47:11 48:5 staff 55:21 stamped 41:8 started 17:24 22:4 22:21 24:13 28:15 29:1,17 29:22 30:7,10 51:12 58:19 state 1:14 3:8 31:20 65:1,5 stated 56:11 States 1:1 3:14 63:1 Stateville 7:3 17:16 19:16,21 20:8 21:9,10 37:23 41:1 48:2 50:3,7 56:17 59:14 status 60:8 Statute 62:16 stay 20:10 28:3 stayed 9:24 33:12 54:14 stenographically 65:8 steps 51:21 Steve 56:12 Steven 2:2 62:5 stopped 17:12 Street 1:17 2:3 62:1,6 struck 16:16 18:1 19:9 submit 49:6 submitted 49:21 subscribe 63:12 SUBSCRIBED 63:18 subsequent 13:18 suffering 58:1,7 suggest 33:21 suit 65:16 Suite 2:3,7 62:6 summer 16:23 summertime 17:1	supplemental 13:1,2 supposed 26:9,21 27:1 30:21,22 Supreme 1:15 sure 3:24 4:7,19 5:8 9:15 15:20 21:18 34:13 38:15 46:19 56:2 surgery 14:19 swelling 28:17 30:10,12 swollen 24:22 sworn 3:1,4 63:18 65:6 symptoms 36:7 41:20,22 44:5 46:16 <hr/> T <hr/> T 2:15 take 5:21,24 18:8 18:10 22:10 35:4,6 40:7 41:9 42:14 51:20,23 52:7,17,20 56:5 57:8 59:17 taken 1:10 6:3 37:9,13 62:10 talk 52:23 59:11 talked 23:14 32:19 talking 18:14 56:16 58:17 tell 6:16 10:18 12:9 14:7 17:11 17:21 18:23 21:24 23:15 32:17 34:4 38:15 47:1 ten 16:1,2 23:14 23:15 56:23 57:5 terms 54:21 terrible 23:13	testified 3:5 57:13 testify 65:7 testifying 6:7 testimony 65:11 Thanks 38:10 theft 12:11 37:15 37:18 thereof 1:15 65:17 65:18 thing 51:22 things 25:4 46:22 think 12:1,4 20:22 23:8 29:15 32:7,22 33:14 34:13,24 36:4,11,22 37:15,16,22 39:2,6 43:12 44:15 46:19 47:16 50:17,24 51:12 56:1,4 57:13 58:12,18 61:1 third 12:19 thought 10:23 19:23 three 16:13 28:23 28:23 three-page 42:12 52:5 ticket 27:11,15 time 5:21 17:9,22 20:20 21:3 22:19,24 25:6,7 29:14,24 30:6,8 33:9 35:10 36:3 40:15 41:23 42:3,4 43:3,11 43:13,23 44:4,9 44:12,18 46:17 46:23 54:13 58:1 63:11 65:12 times 16:12,14 today 3:11 4:9 6:7 6:23 7:15
--	---	--	--	---

Cedric Johnson

today's 6:12 7:2 told 22:3 26:21,21 30:21 34:2 48:22 51:23 53:15 59:13 top 22:4 60:19 touching 14:13 training 10:10,12 transcript 4:16 61:4 62:10,11 62:14 63:10,13 65:10,11 transferred 20:9 20:14 31:24 32:3 37:20,22 transferring 33:13 trauma 58:13 treat 38:18 treatment 13:19 13:20 34:7,9 47:23 trial 12:12 tried 22:12,13 50:2 trouble 5:14 Trubac 2:2,13 9:13 12:24 13:11,14 15:19 18:8,10 35:4,17 38:8,10 40:7,16 43:12 44:6 45:8 56:4,9,12 60:13 61:3,7 62:5 true 44:13 63:13 65:11 truly 62:19 truth 65:7 truthfully 6:7 try 4:22 43:6 60:1 trying 39:13 40:20 52:13 60:7 turn 50:16 58:15 turned 50:15 51:8 51:10	two 8:6,22 9:24 11:22 15:8,9,10 17:6 22:16,23 24:20 51:16,21 52:18 53:7 two-page 40:2 41:7 42:11 Tylenol 25:23 31:17,21 typewriting 65:9 typing 4:3 <hr/> U uh-huh 4:14 ultimately 20:13 27:14 49:16 underneath 24:21 understand 6:4 31:2 38:14 40:16 understanding 9:17 10:16 12:15 13:16 14:2 16:15 19:20 21:2,20 26:14 35:9 49:5 49:14 50:19 52:19 understood 5:18 unit 25:8,11 26:19 United 1:1 3:14 63:1 use 60:23 <hr/> V VEDRINE 2:6 verbal 4:13,20 versus 3:13 Vienna 32:1,3,5 32:15 33:7,8,10 33:13 vision 20:19,23 21:2,12,13 36:16 visited 14:24 voices 43:7	vs 1:5 62:8 63:5 64:2 <hr/> W W 65:2 Wacker 2:7 wait 4:23 5:2 walk 10:19 13:24 walked 25:3 want 5:2 37:10 43:1 wasn't 31:9 way 48:15 65:15 65:16 we'll 39:20 53:1 61:3,5 We're 3:11 5:22 week 15:9 16:12 16:14 weeks 30:3 went 10:2 12:18 14:3 17:2 26:20 26:22 28:17 30:10,12 34:1 36:9 38:18 47:19 54:4 weren't 56:22 West 1:17 62:1 white 27:23 28:11 28:15,19 winter 16:24 withdrawal 20:4 witness 2:11 3:1 13:4 18:9 40:17 45:11 64:1 65:12,18 woke 18:22 words 43:7 work 41:19 58:1 worked 11:4 54:5 working 10:20 12:7 worksheet 41:23 worse 17:19 19:5 29:7 57:3 worser 29:5	wouldn't 23:6 wound 14:4,7 write 48:16 49:5 writing 42:1 44:18 wrong 47:2 wrote 7:9 42:2 44:17 51:22 <hr/> X X 2:10,15 X-ray 26:8 X-rays 36:24 <hr/> Y Yeah 22:17 53:12 55:14 year 11:22 16:23 39:6 years 9:9 11:22 yelling 22:21 <hr/> Z <hr/> 0 084-004218 65:23 <hr/> 1 10 21:15,21 29:13 12 63:8 12:50 1:18 12th 1:19 13 12:7,7 14 30:18 15 1:17 3:13 9:9 62:1 15CV885 1:5 62:8 63:5 161 2:3 62:6 19 8:24 1994 14:3 16:5 17:6,20 <hr/> 2 2:50 61:8 20 8:24 20:24 20/200 20:23	200 21:1 2004 16:15,19 17:6,20 18:1,5,7 54:10 2014 19:15,17 20:2,14 21:16 21:21 29:13 32:1 33:22 34:19 52:12 54:8,13,23 56:18 59:8 2015 35:12,23 36:21 37:4,5,10 2016 9:18 11:9 34:19 43:20 45:3,22 47:11 57:18 2017 1:19 62:3 63:8,19 65:19 21 62:3 21st 65:19 2200 2:7 24 6:10 242 40:3 243 40:3 249 42:13 251 42:13 253 41:8 254 41:8 274 52:6,10 275 53:1,11 276 52:6 53:5 277 52:7 53:19 28 62:16 <hr/> 3 3 2:12 39 2:17 <hr/> 4 41 2:17 42 2:18 4300 2:3 62:6 45 7:18 <hr/> 5
--	---	--	--	--

Cedric Johnson

<div>52 2:18</div> <div>56 2:13</div> <div>5th 52:12</div> <div>6</div> <div>6/12/17 62:10</div> <div>64:2</div> <div>60 2:13</div> <div>60432 62:2</div> <div>60601 2:3,7 62:7</div> <div>7</div> <div>7801 7:24 9:8,22</div> <div>8</div> <div>815-727-4363</div> <div>62:2</div> <div>885 3:13</div>				
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